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VIA ECF

June 2, 2023

The Honorable Ona T. Wang
United States District for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*,
No. 1:21-cv-09441-PGG-OTW (S.D.N.Y.)

Dear Judge Wang:

On behalf of Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”), I write regarding a discovery issue discussed at the May 11, 2023 status conference.

JPMorgan seeks a court-ordered deadline for the five dealer banks to produce documents responsive to JPMorgan’s outstanding document subpoenas. The Court indicated at the status conference that it would agree to a written proposal for a production deadline. We respectfully request that the Court order that substantial completion of the productions be made by June 30, 2023. Counsel for Defendant Tesla, Inc. has not yet taken a position on this request.

At the next June 22, 2023 status conference and after the proposed June 30, 2023 date, JPMorgan reserves the right to raise issues related to the scope and timing of the banks’ productions, and any need for motion practice, once JPMorgan receives and reviews any additional productions that arrive prior to those dates.

Respectfully submitted,

By: /s/ Joshua D. Liston
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cc: All counsel of record (by ECF)